

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's own Motion to Require Interconnected Voice Over Internet Protocol Service Providers to Contribute to the Support of California's Public Purpose Programs.

Rulemaking 11-01-008
(Filed January 13, 2011)

**DECISION GRANTING COMPENSATION TO
THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO
DECISION 13-02-022**

Claimant: The Utility Reform Network (TURN)	For contribution to Decision 13-02-022
Claimed (\$): \$16,496.74	Awarded (\$): \$16,496.74
Assigned Commissioner: Michael R. Peevey	Assigned Administrative Law Judge: Kelly A. Hymes

PART I: PROCEDURAL ISSUES

- A. Brief Description of Decision:** The Final Decision addresses the background of the docket and the work by the Legislature to create a statutory requirement for Voice over Internet Protocol (VoIP) carriers to contribute to the Commission's Public Purpose programs and to clarify certain regulatory classification issues also relating to VoIP carriers. The Final Decision notes that other proceedings or new proceedings will be utilized to the extent issues that were pending in the docket still need to be addressed. The Final Decision closes the docket.

B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	N/A	Correct
2. Other Specified Date for Notice of Intent (NOI):	N/A	
3. Date NOI Filed:	April 6, 2011	Correct
4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on Administrative Law Judge (ALJ) ruling issued in proceeding number:	Application (A.) 09-09-013	Correct
6. Date of ALJ ruling:	January 7, 2010	Correct
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	Petition 10-08-016	Correct
10. Date of ALJ ruling:	November 22, 2010	Correct
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	Decision (D.) 13-02-022	Correct
14. Date of Issuance of Final Order or Decision:	March 5, 2013	Correct
15. File date of compensation request:	May 6, 2013	Correct
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION

A. In the fields below, describe in a concise manner Claimant’s contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059).

Contribution	Specific References to Claimant’s Presentations and to Decision	Showing Accepted by CPUC
<u>Procedural History</u> The Commission adopted the Order Instituting Rulemaking (OIR) in this docket	OIR at 7; Final Decision at 1	Yes

noting that “the need for changes to universal service programs has become apparent as new and established carriers have deployed ‘interconnected IP-based’ voice services more extensively.”

The OIR tentatively concluded that it was necessary to require “interconnected VoIP telephone service providers” to contribute to the Commission’s Public Purpose programs for several reasons including support of the “long-standing” goal of universal service, viability of the Funds, competitive neutrality, and compliance with FCC rules. Therefore, the OIR not only requested comments specifically on the tentative conclusion that these carriers should remit end user surcharges, but additional issues exploring the Commission’s legal authority to impose this requirement and the implementation issues regarding payment procedures.

Shortly after parties filed opening and reply comments on the OIR, the Legislature amended two bills to create statutory requirements for VoIP carriers to remit money to the Commission’s Public Purpose programs. Both bills were chaptered in October 2011 (Assembly Bill (AB) 841 (Stats. 2011, chapter 685); Senate Bill (SB) 3 (Stats. 2011, chapter 695)).

On November 9, 2011 CPUC Executive Director Clanon issued a memo to all interconnected VoIP service providers in California citing AB 841 as authority to create a registration and surcharge remittance process for the Commission’s Public Purpose Programs.

The Final Decision states that the Commission opened the rulemaking because it was “persuaded of the importance of requiring contributions from intrastate end-users of interconnected VoIP service.” However, the Final Decision notes that the Legislature’s actions rendered the rulemaking moot.

The Final Decision also references

<p>SB 1161 (Stats. 2012, Ch. 733). This legislation was introduced the session after AB 841. There was no activity in the docket while the Legislature debated SB 1161 because the bill addressed issues of regulatory classification for VoIP providers in California, including those issues relating to a Motion pending in docket filed by CPSD. Although the Final Decision declines to create a roadmap for outstanding issues pending in the docket as requested by The Utility Reform Network (TURN) and CforAT, it does acknowledge that some issues regarding the implementation of SB1161 may need clarification and that such work will be done in other proceedings.</p>		
<p>TURN filed opening and reply comments on the OIR and comments on the Motion filed by CPSD. It also filed comments on the Proposed Decision. Each of these filings represented TURN's participation in the docket on behalf of consumers that currently benefit from the Commission's Public Purpose programs and who would be harmed if those programs were to become under-funded. However, TURN also represented VoIP customers who may pay this new surcharge. In that role, TURN filed comments on the procedural and logistical issues regarding the surcharge collection raised by the Commission and on the consumer protection issues raised by CPSD in its Motion.</p> <p>The issues addressed by TURN were relevant and important to policy makers both at the Commission and the Legislature. In the OIR, the Commission noted the importance of these issues to the overall goal of universal service and the viability of its Public Purpose programs. It was entirely appropriate for TURN to address these issues and, while the Commission did not issue a Final Decision</p>	<p>Final Decision at 2; TURN Opening Comments on OIR, filed March 7, 2011; TURN and Disability Rights Advocates Reply Comments on OIR, filed March 22 2011.</p>	<p>Yes</p>

on the merits of these issues, it did acknowledge the importance of these issues as noted in the OIR and the statutory requirements adopted by the Legislature.		
<p><u>Surcharge Requirement</u></p> <p>The OIR described the Commission's tentative conclusion that interconnected VoIP carriers should be required to contribute to the Commission's public purpose programs through an end user surcharge on intrastate revenues. The OIR requested comment on that conclusion as well as other issues related to the details and implementation of the surcharge requirement.</p> <p>TURN filed opening and reply comments in support of the Commission's position, including the proposal that VoIP carriers contribute to all of the Public Purpose programs not just LifeLine and the adoption of the three different surcharge calculation methodologies proposed in the OIR.</p> <p>As the Final Decision notes, VoIP providers are now required to pay these surcharges. The Legislation and the Executive Director's letter make it clear that these carriers must remit end user surcharges calculated through the three methodologies originally proposed by the Commission and the carriers must contribute to all of the programs, not just LifeLine as initially proposed by the OIR.</p>	OIR at 24, 29-30; TURN Opening Comments on OIR at 1, 9-11; TURN and Disability Rights Advocates Reply Comments on OIR at 2-3, 9-12.	Yes
<p><u>Registration Process</u></p> <p>Based on the tentative conclusion that carriers must contribute, the OIR requested comment on the proposed registration process and form for VoIP carriers that must remit surcharges.</p> <p>TURN filed opening comments on the OIR's proposed registration form urging the Commission to go farther than a simple registration process. However, if the</p>	OIR at 30-32; TURN Opening Comments on OIR (filed March 7, 2011) at 9; November 9, 2011 Letter from Executive Director Clanon to Interconnected VoIP service providers at 2.	Yes

<p>Commission required nothing more than registration, TURN suggested that the form itself should require more information than that proposed in the OIR.</p> <p>The November Executive Director Letter implementing AB 841 required VoIP carriers to complete a registration form posted on the Commission website. The final VoIP registration form is more detailed and requests more information from the carrier than the form originally proposed in the OIR. Indeed, the current registration form is very similar to the wireless registration form as TURN proposed in opening comments.</p>		
<p><u>CPSD Motion</u></p> <p>CPSD filed a Motion in this docket requesting that the Assigned Commissioner expand the scope to determine whether VoIP carriers should also be subject to certain consumer protections rules in addition to the surcharge requirements.</p> <p>TURN filed comments jointly with CforAT (DisabRA) supporting CPSD's Motion. TURN pointed out that the OIR adopted by the Commission expressed an urgent need to address issues related to VoIP regulation because California consumers continue to increase their use of VoIP. The Commission expressed concern about competitive neutrality and consumer protection, therefore the issues raised by the CPSD Motion were also appropriate to include in the scope because they addressed the same concerns expressed by the Commission in the OIR. Several parties to the case, at the direction of ALJ Walwyn, filed responses to the CPSD Motion.</p> <p>Like the original issues of Public Purpose surcharges, the issues raised by CPSD were also preempted by legislative action. For these additional issues, it was not only the introduction of AB 841 that ultimately rendered these issues moot, but the Commission also found that SB 1161,</p>	<p>Consumer Protection and Safety Division Motion for Modification, March 8, 2011; Response of TURN and Disability Rights Advocates to Motion for Modification of Consumer Protection and Safety Division, April 4, 2011.</p>	<p>Yes</p>

<p>introduced the next legislative session, also directly addressed the types of consumer protection rules applicable to certain VoIP carriers as also discussed in the CPSD Motion.</p> <p>In comments on the Proposed Decision, TURN and CforAT noted that the issues raised by CPSD had never been addressed in the docket and urged the Commission to explicitly assign these issues to another docket or to direct that a new docket be opened. Although not as specific as requested by TURN, in the Final Decision, the Commission acknowledges that some open issues regarding implementation of SB 1161 remain and that other dockets or new dockets will address these issues.</p>		
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding¹?	Yes	Correct
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Correct
c. If so, provide name of other parties: <p>The additional intervenors representing various consumer interests in this docket included Greenlining Institute and the Disability Rights Advocates. The advocate for the Disability Rights Advocates moved to a new organization during this docket and the intervenor work was continued by the Center for Accessible Technology.</p>		Correct
d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: <p>TURN worked very closely with the other intervenors to avoid duplication of effort. There were numerous parties to this docket, but only three other parties</p>		Correct <p>In comparing parties' efforts shown in this and other claims, we find that duplication</p>

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill 96 (Budget Act of 2013 public resources), which was approved by the Governor on September 26, 2013.

<p>represented certain consumer interests. TURN coordinated with each of these parties to share work effort, emphasize specific issues and coordinate resources. Indeed, a review of opening and reply comments on the OIR demonstrate that ORA, Greenlining, and TURN, for example, emphasized very different issues. While ORA and Greenlining focused on narrow implementation issues and broader legal issues in its comments, TURN focused on policy issues and Commission precedent in its comments and requests to the Commission to expand the scope of the docket and increase the registration requirements. TURN also filed joint comments with Disability Rights Advocates/Center for Accessible Technology in order to conserve the resources of both groups.</p> <p>In sum, the Commission should find that TURN's participation was efficiently coordinated with the participation of other intervenors wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor.</p>	<p>was avoided to the extent possible.</p>
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PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)

A. General Claim of Reasonableness (§§ 1801 & 1806):

a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation:	CPUC Verified
<p>TURN's request for \$16,496.74 represents a reasonable, but modest, investment of resources in this docket which, if it had resulted in a Commission decision on the merits, would have directly benefited those beneficiaries of the Commission's Public Purpose programs as well as those VoIP customers paying the new surcharge. In many forum, including the Commission and the Legislature, TURN works to ensure that surcharge money collected from end users by carriers and remitted to the Commission is properly collected and efficiently spent. TURN focuses much of its telecommunications advocacy resources on issues relating to the Commission's Public Purpose programs. Therefore, TURN's participation in this docket was not only reasonable but a critical part of the bigger agenda of TURN's advocacy. Although the Commission did not issue a final decision in this docket on the merits, as discussed above, the Commission did require additional information from the registered VoIP carriers that will be submitting collected surcharge money pursuant to AB 841. In addition, the Commission did acknowledge that outstanding issues, if any, may be dealt with in other proceedings. This language provides consumers of VoIP services, competitors of VoIP service providers, and beneficiaries of Public Purpose programs additional forums to raise their future concerns.</p> <p>The Commission should therefore conclude that TURN's modest request is reasonable in light of the substantial benefits to ratepayers that were</p>	<p>We agree that, while this proceeding did not result in a decision based on the merits of the case, TURN's participation in this proceeding would have benefited the participants of the Commission's Public Purpose Programs. We note that in the OIR, the Commission preliminarily adopted the policy that Voice over Internet Protocol providers contribute to these programs which TURN supported. The State Legislature ultimately adopted a bill requiring VoIP providers</p>

directly attributable to TURN's participation in the case.	to contribute to the Public Purchase programs.
<p>b. Reasonableness of Hours Claimed</p> <p>Compensation Appropriate</p> <p>In light of the critical nature of the issues presented by the OIR that could impact the future of the Commission's Public Purpose Programs and the protection of those VoIP customers in California paying the proposed surcharges, TURN was an active party to this rulemaking. It filed comments (jointly with CforAT) at each opportunity, including in response to the Motion filed by the Consumer Protection and Safety Division (discussed above). The hours requested in this compensation request are modest and represent a reasonable effort by TURN to participate on the issues most relevant to consumers.</p> <p>However, due to the actions of the Legislature, the Commission did not issue a Final Decision on the merits of the issues pending in the docket, thereby making it impossible for TURN to demonstrate specific substantial contribution as required by Rule 17.3 of the Rules of Practice and Procedure.</p> <p>The Commission has allowed intervenors to request compensation in circumstances where the actions of an outside entity such as the Legislature, a federal agency or even a utility, render the proceeding moot. Indeed, the Commission has specifically stated that, "we see no reason to increase the intervenor's risk by denying compensation in a proceeding that is prematurely terminated for reasons that are not reasonably foreseen and are beyond [the intervenor's] control." <i>2005 Cal. PUC LEXIS 534</i>*14. <i>See also, D.02-07-030, 2002 Cal. PUC LEXIS 438, *13; D.02-08-061, 2002 Cal. PUC LEXIS 512; *9-11</i> (TURN work eligible for compensation even though Edison rate request was dismissed prior to substantive work on the issues in the case); <i>D.04-03-031, 2004 Cal. PUC LEXIS 78, *12-16</i> (Finding it appropriate for TURN to begin work on the proceeding due to the relevance of issues despite no decision on merits because of legislative preemption); <i>D.05-12-038, 2005 Cal. PUC LEXIS 534, *9-14; D.06-06-026 at 5-6; D.07-07-006, 2007 Cal. PUC LEXIS 319, *9. D.07-07-031, 2007 Cal. PUC LEXIS 340, **9-14.</i></p> <p>Most recently, in the Commission's investigation of the AT&T/T-Mobile merger, the Commission found it "reasonable for parties otherwise eligible to request intervenor compensation to do so in this case, despite the fact that the Commission will not be making any final determination on the merits of the merger." (I.11-06-009, D.12-08-025)</p> <p>The Commission has consistently held that intervenors may receive compensation in cases where the Commission does not issue a decision on the merits so that it may uphold the intent of the Legislature expressed in</p>	<p>We confirm that the Commission has allowed intervenors to request compensation where the actions of an external entity have rendered the proceeding moot.</p>

Public Utilities Code Section 1801.3(b) to administer the intervenor compensation program in a manner that encourages public participation. It would be unreasonable to expect intervenors to speculate at the beginning of each docket whether or not the docket may be dismissed or preempted in some way and to penalize those intervenors by denying compensation for reasonable work performed in the docket. Therefore, TURN urges the Commission to find compensation reasonable in this docket.

TURN Hours

Due to outside events impacting this docket, TURN's request for compensation is very modest. The amount requested represents mainly the work of only one TURN advocate. TURN participated at all stages of the docket; however, because the docket was suspended while a total of three pieces of legislation were debated in Sacramento (AB 841, SB 3, and SB 1161) there were limited opportunities for participation.

TURN Attorneys and Advocates:

Christine Mailloux was TURN's lead attorney for this case. She was responsible for developing TURN's advocacy positions and filings in this docket and TURN's work with the other intervenors.

TURN submits that the recorded hours are reasonable. Therefore, TURN seeks compensation for all of the hours recorded by our staff members and outside consultants as included in this request.

Compensation Request Preparation Time: TURN is requesting compensation for approximately 6 hours devoted to preparation of this request for compensation. TURN notes that this is a small amount of preparation relative to other compensation requests that involved significantly more compensation. However, there are minimal requirements that every compensation request must include, regardless of the total amount of the request. Therefore, even though this request is for a smaller amount of compensation, there will still be a minimal amount of hours devoted to the drafting of the request due to those basic requirements.

Hourly Rates of TURN Staff and Consultants

TURN's request for compensation covers work performed in 2011 and 2013. For Christine Mailloux, the Commission has previously approved continued use of the hourly rate of \$390 first approved for work she performed in 2008 to work she performed in 2010. (D.10-09-040, in R.09-05-006). Consistent with Resolution ALJ-267, TURN seeks compensation for her 2011 work at the same previously-approved hourly

We find that TURN's hours and costs are reasonable and warrant compensation.

We continue to compensate Mailloux for work completed in 2011 at the previously approved hourly rate of \$390. We adopt an hourly rate of \$420 for Mailloux for the work

<p>rate of \$390. For Ms. Mailloux's work in 2013, TURN is requesting a Cost of Living Adjustment and a step increase that should go into effect for work performed beginning in 2012. (Res. ALJ-281, at 6.) Therefore, Ms. Mailloux's rate for work performed in 2013 would be \$420, which represents her 2011 rate of \$390 escalated by a COLA of 2.2% and a 5% step increase.</p> <p>TURN notes that the Commission recently adopted an additional 2% COLA adjustment for work performed in 2013 (Res. ALJ-287, 4/29/2013). Because of the small amount of hours in this compensation for 2013, many of which are hours spent on this compensation request, TURN is not including this additional 2% COLA in this compensation request. However, TURN reserves the ability to include this additional COLA request in future compensation requests where the amount of hours performed in 2013 are more substantial.</p> <p>Mr. Nusbaum has only one hour in this docket. For his work, performed only in 2011, TURN requests his approved rate of \$435 (D.10-07-014 and Res. ALJ-281).</p> <p>TURN submits that this information is more than sufficient for the Commission to grant the requested hourly rates for these three consultants. However, should the Commission disagree and believe that it needs more information to support the request, TURN asks that we be informed of the additional information that is necessary and given an opportunity to provide that information before a draft decision issues on this compensation request.</p> <p>Reasonableness of Expenses</p> <p>TURN requests that the Commission approve its expenses associated with its participation in this case. The very minimal expenses consist of photocopying expenses and postage for only a single pleading. The Commission should find TURN's direct expenses reasonable.</p>	<p>completed in 2012. This represents a 7.2 percent increase (a 5 percent step increase and a 2.2 percent cost of living adjustment) over the 2008 hourly rate of \$390 rounded up to the nearest \$5.</p> <p>We continue to compensate Nusbaum at his previously adopted rate of \$435 per hour.</p> <p>We find the expenses requested for compensation are reasonable.</p>
<p>c. Allocation of Hours by Issue</p> <p>TURN identifies the following issues by code that it addressed in its filings. It has:</p> <p>GP General Preparation- work that generally does not vary with the number of issues that TURN addresses in the case</p> <p>RR Registration Requirement</p>	<p>We find the allocation of hours by issue to be reasonable.</p>

PR	Payment Requirement- including, types of public purpose programs, jurisdiction issues, and need for legislative intervention	
MP	Methodology for Calculation- focus on three methods from FCC	
RC	Regulatory Classification- including whether or not VoIP can be considered telephone corporations	
CPSD	CPSD Motion	
#	Combination- Some time entries cannot be reliably identified or broken down into specific issue areas. For these entrees, TURN has used the “#” code to indicate work performed on multiple issues in the following proportion: PR-40%; RC-30%; RR-20%; MP-10%	
COMP	Compensation- work on TURN’s compensation request and compensation related activities such as the NOI	
TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission’s rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.		

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Christine Mailloux	2011	33.00	\$390	D.11-07-023	\$12,870.00	33	\$390	\$12,870.00
Christine Mailloux	2013	4.25	\$420	Res. ALJ-267	\$ 1,785.00	4.25	\$420	\$ 1,785.00
Bill Nusbaum	2011	1.00	\$435	Res. ALJ-281	\$ 435.00	1	\$435	\$ 435.00
	Subtotal:				\$ 15,090.00	Subtotal:		\$ 15,090.00

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate	Basis for Rate*	Total \$	Hours	Rate	Total \$
Christine Mailloux	2011	1.0	\$195		\$ 195.00	1	\$195	\$195.00
Christine Mailloux	2013	5.75	\$210		\$ 1,207.50	5.75	\$210	\$ 1,207.50
	Subtotal:				\$ 1,402.50	Subtotal:		\$ 1,402.50
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopies	Photocopies for ALJ and Assigned Commissioner			\$2.00			\$2.00
	Postage	TURN Pleadings			\$2.24			\$2.24
Subtotal:					\$4.24	Subtotal:		\$4.24
TOTAL REQUEST \$:					\$ 16,496.74	TOTAL AWARD \$:		\$ 16,496.74
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Claimant’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
Attorney		Date Admitted to CA BAR ²		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
William Nusbaum		June 7, 1983		108835		No; please note from January 1, 1997 until October 4, 2002 Mr.Nusbaum was an inactive member of the California Bar.		
Christine Mailloux		December 10, 1993		167918		No		

² This information may be obtained at: <http://www.calbar.ca.gov/>.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(2)(6))?	No

FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to Decision 13-02-022.
2. The requested hourly rates for The Utility Reform Network's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$16,496.74.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. The Utility Reform Network is awarded \$16,496.74.
2. Within 30 days of the effective date of this decision, the CPUC's Intervenor Compensation Fund shall pay \$16,496.74 plus interest. Payment of the award shall include include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning July 20, 2013, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1302022		
Proceeding(s):	R1101008		
Author:	ALJ Kelly A. Hymes		
Payer(s):	Commission's Intervenor Compensation Fund		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
The Utility Reform Network	5/6/13	\$16,496.74	\$16,496.774	No	N/A

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Christine	Mailloux	Attorney	TURN	\$390	2011	\$390
Christine	Mailloux	Attorney	TURN	\$420	2013	\$420
William	Nusbaum	Attorney	TURN	\$435	2011	\$435

(END OF APPENDIX)